

# EXHIBIT Q

August 21, 2020

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1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK  
Case No. 19-CV-4650

4 -----  
5 RAFAEL FOX, PAUL D'AURIA and JILL SHWINER,

6 Plaintiff,

7 v.

8 STARBUCKS CORPORATION d/b/a  
9 STARBUCKS COFFEE COMPANY,

10 Defendants.  
11 -----

12 PORTION OF TRANSCRIPT DESIGNATED CONFIDENTIAL

13 TRANSCRIPT OF ZOOM VIDEOCONFERENCE OF

14 CARLA RUFFIN

15  
16  
17  
18  
19 TRANSCRIPT of the stenographic notes  
20 of the proceedings in the above-entitled matter, as  
21 taken by and before TAB PREWETT, a Registered  
22 Professional Reporter, a Certified LiveNote  
23 Reporter, and Certified Shorthand Reporter with all  
24 parties present remotely via Zoom videoconference on  
25 Friday, August 21, 2020, commencing at 10:05 a.m.

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1 Carla Ruffin

2 it was for her to see what she could do to help the  
3 managers get to where they needed to be. As time  
4 progressed, she -- and she audited stores or did  
5 store visits and -- I remember Mr. Rivera  
6 specifically -- some of those managers were termed.

7 Q They were involuntarily terminated?

8 A Yes. There were some managers chose  
9 to leave and some -- and I don't remember  
10 specifically the number, but there were some  
11 terminations.

12 Q And to be clear, we're talking about  
13 terminations of store managers in the same district  
14 as Mr. Fox when Ms. De La Cruz was the district  
15 manager?

16 A Yes. And I only remember one  
17 specifically, and that's the one I just mentioned,  
18 who I believe his name was Alex Rivera.

19 Q And do you remember one way or another  
20 whether Ms. De La Cruz endorsed and advocated for  
21 Mr. Fox to receive "manager of the quarter"  
22 recognition during the short period of time when she  
23 was district manager of his district?

24 A I don't -- I don't recall.

25 Q When was the most recent write-up or

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1 Carla Ruffin

2 written coaching that Mr. Fox received prior to his  
3 termination?

4 A I have no idea.

5 Q How many years was Mr. Fox a store  
6 manager at Starbucks?

7 A To my recollection, I believe he had  
8 been a manager for eight to nine years.

9 Q How many years was he an employee of  
10 Starbucks?

11 A I don't have that knowledge.

12 Q Did you consult with any district  
13 managers in the course of -- withdrawn. Withdrawn.

14 Just to confirm, what was the full  
15 title, if you were using the fullest, most formal  
16 actual title, of your position in New York?

17 A Regional director of operations.

18 Q Is there any more to the title that  
19 designated your area?

20 A Not in the title.

21 MR. GRAFF: I have no further  
22 questions at this time, unless Mr. Moy has  
23 any?

24 MR. MOY: I believe I do, to clarify  
25 certain things. Can you just give me three